

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE  
PLAYERS' CONCUSSION INJURY  
LITIGATION

No. 2:12-md-02323-AB  
MDL No. 2323

THIS DOCUMENT RELATES TO:  
ALL ACTIONS PENDING AND ALL  
CLAIMS ASSERTED AGAINST ANY  
RIDDELL DEFENDANT

**Hon. Anita B. Brody**

**RIDDELL DEFENDANTS'<sup>1</sup> MOTION TO DISMISS THE PLAINTIFFS' SECOND  
AMENDED MASTER ADMINISTRATIVE LONG-FORM COMPLAINT AND  
AMENDED SHORT-FORM COMPLAINTS<sup>2</sup>**

The Riddell defendants move this Court to dismiss, with prejudice, the plaintiffs' second amended master administrative complaint and amended short-form complaints pursuant to Federal Rules of Civil Procedure 12(b)(1), 12(b)(6), and 12(f). In support, the Riddell defendants rely upon their accompanying brief and attached appendices. For the reasons set forth in those documents, the Riddell defendants respectfully request that this Court grant this motion and dismiss, with prejudice, the plaintiffs' claims against the Riddell defendants.

The Riddell defendants request oral argument on this motion.

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<sup>1</sup> For convenience only, "Riddell" and "Riddell defendants" refers collectively to the following defendants: Riddell, Inc., All American Sports Corporation, Riddell Sports Group, Inc., BRG Sports, Inc. (f/k/a Easton-Bell Sports, Inc.), BRG Sports, LLC (f/k/a Easton-Bell Sports, LLC), EB Sports Corp., and BRG Sports Holdings Corp. (f/k/a RBG Holdings Corp.). The plaintiffs have amended the case style to reflect the new entity names for the entities previously known as Easton-Bell Sports, Inc. and Easton-Bell Sports, LLC. The plaintiffs also, in what appears to be a typographical error, refer to the "formerly known as" entity for BRG Sports Holdings Corp. as "BRG Holdings Corp." The former entity name was actually RBG Holdings Corp. Riddell has no objection to amending the case style to reflect the new entity names identified in this footnote.

<sup>2</sup> The Riddell defendants reserve the right to address all plaintiff-specific claims and short-form complaints at the appropriate time, pursuant to this Court's 10/24/17 Order (ECF No. 8472), which specifically reserves such plaintiff/SFC-specific challenges for a later round of motions practice.

Dated: January 19, 2018

Respectfully submitted,

/s/ Paul G. Cereghini

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CERTIFICATE OF SERVICE

The undersigned certifies that on January 19, 2018, the foregoing Riddell Defendants' Motion to Dismiss the Plaintiffs' Second Amended Master Administrative Long-Form Complaint and Amended Short-Form Complaints was electronically filed and served via ECF on all counsel of record registered to receive service via the Court's CM/ECF system.

/s/ Paul G. Cereghini